

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

SHENIECE CLARK, : 12 Civ. 9372 (KMK) (LMS)
:
Plaintiff, :
: DECLARATION OF STEVEN
v. : MAYO IN SUPPORT OF
: DEFENDANT'S MOTION FOR
: SUMMARY JUDGMENT
:
JEWISH CHILD CARE ASSOCIATION, INC., :
:
Defendant. :
:
----- X

STEVEN MAYO, declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

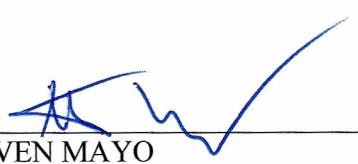
1. I am employed by Jewish Child Care Association, Inc. (“JCCA”) as its Vice President, Human Resources. I am fully familiar with all of the facts stated herein, and make this Declaration based on my personal knowledge and/or review of JCCA business records kept in the ordinary course of business.
2. JCCA is a not-for-profit organization providing a full range of social and residential services to children and their families in the New York metropolitan area.
3. JCCA’s residential treatment center in Pleasantville, New York – the Pleasantville Cottage School (although it is not a school) (“PCS”) – serves children at risk to themselves or others, who cannot live at home.
4. Among other staff, PCS employs Milieu Counselors (child care employees) who directly supervise the everyday needs and activities of the residents.

5. PCS's programs are regulated by the New York State Office of Children & Family Services ("OCFS"), which is particularly concerned about preventing child abuse or neglect at such programs.

6. In June 2010, Cedeka Gooden, sister of Plaintiff Sheniece Clark ("Clark"), filed a complaint with the New York City Commission on Human Rights and the U.S. Equal Employment Opportunity Commission against JCCA asserting sex discrimination and retaliation claims under Title VII of the Civil Rights Act and the New York City Human Rights Law, but no claims under the ADA.

7. Michelle Borges was a Senior Human Resources Associate at JCCA in 2010 and 2011, during the relevant period in this action.

Dated: Brooklyn, New York
August 5, 2014



STEVEN MAYO